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NAME OF COMMITTEE (In Full)
Right to Rise USA

FEC IDENTIFICATION NUMBER
C00571372

Mailing Address 6230 WILSHIRE BLVD. PMB 1790

City	State	ZIP Code
LOS ANGELES	DC	90048

Dear Ms. Seufert:

This response pertains to the Reports Analysis Division's ("RAD") Request for Additional Information ("RAI") dated April 13, 2016, concerning Right to Rise USA's ("RTR") February Monthly Report filed on February 20, 2016. The RAI requests clarification of several items, which are addressed in turn below.

- 1.This has been revised to "Get-out-the-vote consulting services" in an amended February Monthly Report.
- 2.These were expenditures for national cable media buys on the Fox News network that were not specific to any state. Unlike broadcast media buys made on a local-affiliate basis, these buys were aired to every Fox News cable subscriber nationwide. A combination of differing pricing models and the fact of national airing makes it impossible to itemize such buys on a per-state basis. We urge the Commission to provide clarity to groups participating in the 2016 Presidential primary elections and adopt a reasonable interpretive rule governing these types of national advertisements.
- 3.With regard to the cited disbursement to Oath Strategies LLC, RTR brought this issue to the Commission's attention in RTR's sua sponte submission dated February 24, 2016. With regard to the cited disbursement to McCarthy Hennings Whalen, Inc., RTR promptly reported this independent expenditure in a 24-hour report as soon as information that could require a report was disclosed by the vendor. Pursuant to the Commission's Statement of Policy Regarding Treasurers' Best Efforts from 2007 (Notice 2007-13, 72 FR 31438), RTR used its best efforts and took all reasonable steps to expeditiously file the 24-hour independent expenditure report.
- 4.With regard to the cited disbursements to Oath Strategies LLC, RTR brought this issue to the Commission's attention in RTR's sua sponte submission dated February 24, 2016. With regard to the cited disbursements to McCarthy Hennings Whalen, Inc., RTR promptly reported these independent expenditures in a 48-hour report as soon as information that could require a report was disclosed by the vendor. Pursuant to the Commission's Statement of Policy Regarding Treasurers' Best Efforts from 2007 (Notice 2007-13, 72 FR 31438), RTR used its best efforts and took all reasonable steps to expeditiously file the 48-hour independent expenditure report.